

McGREGOR W. SCOTT
United States Attorney
WILLIAM S. WONG
JASON HITT
Assistant U.S. Attorneys
501 I Street, Ste 10-100
Sacramento, CA 95814
Telephone (916) 554-2790

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA)	
)	CR. NO. S-99-433-WBS
Plaintiff,)	
)	
v.)	STIPULATION AND ORDER
)	
JOHN THAT LUONG, et al.,)	DATE: December 20, 2006
)	TIME: 10:00 a.m.
Defendant.)	CTRM: Honorable William B. Shubb
_____)	

The United States of America, through its counsels of record, McGreggor W. Scott, United States Attorney for the Eastern District of California, and William S. Wong and Jason Hitt, Assistant United States Attorneys; defendant John That Luong, through his counsel, Richard Mazer, Esq., stipulate and agree to the following revised motion schedule regarding John That Luong's Motion for Reconsideration of His Motion to Dismiss the Indictment currently set for October 25, 2006 at 9:00 a.m.:

1. Government's opposition shall be filed no later than November 24, 2006;
2. Defendants' reply, if any, shall be filed no later than December 6, 2006; and

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3. Hearing on the motion set for December 20, 2006,
at 10:00 a.m.

Counsel for the government needs additional time to research
and prepare its responses to the defendant's motion. Counsel for
the government has just completed a lengthy trial in the case of
United States v. Huy Chi Luong, et al., CR-S-96-0350 WBS.

Accordingly, the parties stipulate that time be excluded for the
pendency of this motion pursuant to 18 U.S.C. § 3161(h)(1)(F) -
delay resulting from any pretrial motion and 18 U.S.C. §
3161(h)(8)(B)(ii) - additional time to adequately prepare for
pretrial proceedings.

Respectfully submitted,

McGREGOR W. SCOTT
United States Attorney

DATED: October 13, 2006

By: /s/ William S. Wong
WILLIAM S. WONG
Assistant U.S. Attorney


DATED: October 13, 2006

By: /s/ Richard Mazer
RICHARD MAZER for defendant
John That Luong

ORDER

For the reasons set forth above, the revised law and motion
schedule is adopted. Furthermore, time is excluded for the reasons
set forth above.

DATED: October 16, 2006


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE